

Federal Communications Commission
Gettysburg, PA 20554
February 11, 2002
RE: ET Docket 01-278

Sirs:

This letter is in response to your request for comments on Docket 01-278. I am opposed to the proposed increase in acceptable Part 15 emission levels in the 430 MHz range of the Amateur Radio Service. See paragraphs 25-27 of Docket 01-278.

I am also opposed to the increased acceptable emission levels and increased bandwidth in the 13.56 MHz band. See paragraphs 20-23 of same Docket.

The European unlicensed band at 433 MHz has formed a market for low power wireless products. These range from data transmitters to wireless weather stations. These devices are finding their way to the U.S. consumer. This is setting the stage for the 440 MHz Amateur band to become a copy of the 902-928 MHz band that is not by used Amateurs who wish to avoid conflict with Part 15 devices. An increase in levels will only compound problems. The ARRL has already commented on the effects of these increases; I agree with their comments.

Allowing increases for these types of devices will set a precedence for Part 15 changes in the future and open the flood gates for easy access to our Amateur bands by corporations whose concerns are short sighted and profit motivated without regard to our Amateur Radio "national resource". I feel that slowly this resource is being chiseled away and will never be returned to us.

I would like to add some general comments about the evolution of Part 15 and the impact that continuously increasing emissions have on the Radio Amateur's environment in close proximity to consumer RF generating Part 15 electronics.

Many more issues of interference to Amateur operations from consumer devices occur than are currently realized. The burden of resolving these issues is put squarely on the Amateur Operator. Recently in Michigan, an interference situation (susceptibility) between an Amateur and his neighbor's Part 15 devices (such as a touch lamp), illustrate the extreme difficulties that can occur while attempting to solve a simple local interference problem.

See ARRL article <http://www.arrl.org/news/stories/2002/01/28/1/?nc=1>

An unlicensed Part 15 device is intended for an end user who does not need, nor have any knowledge of the product engineering design, and who only expects that the device will work as advertised. When an interfering signal is encountered the licensed user must identify it, locate it, contact the user, and convince him to cease operation. This rule gives the unlicensed user a higher status, as the burden of proof is the responsibility of the licensed user. This is an unacceptable situation especially for the Amateur Radio Operator that is more likely to have to deal with these problems at a personal level.

Part 15 is the major gating factor governing all these problems, and any changes in these regulations should be considered seriously with regard to how small modifications could greatly affect our Amateur Radio spectrum resources.

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